

FILED

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

-v.-

FRANKLYN ANGEL ESTRELLA,
SAUL CARILLO,
SAUL ANTONIO PAEZ,
a/k/a "Tony,"
CARLOS ALBERTO ESTRADA-MORALES
SONNY PEQUERO,
a/k/a "Ramon Antonio Perez-Rodriguez,"
EDDISON GLOSS, and
JAIME DUARTE-MARTINEZ,

Defendants.

COUNT ONE

The Grand Jury charges:

1. In or about August 2008, in the Southern District of New York and elsewhere, FRANKLYN ANGEL ESTRELLA, SAUL CARILLO, SAUL ANTONIO PAEZ, a/k/a "Tony," CARLOS ALBERTO ESTRADA-MORALES, SONNY PEQUERO, a/k/a "Ramon Antonio Perez-Rodriguez," EDDISON GLOSS, and JAIME DUARTE-MARTINEZ, the defendants, and others known and unknown, unlawfully, intentionally, and knowingly did combine, conspire, confederate and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that FRANKLYN ANGEL ESTRELLA, SAUL CARILLO, SAUL ANTONIO PAEZ, a/k/a "Tony," CARLOS ALBERTO ESTRADA-MORALES, SONNY PEQUERO, a/k/a "Ramon Antonio Perez-Rodriguez," EDDISON GLOSS, and JAIME DUARTE-MARTINEZ, the defendants, and others known and unknown, would and

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did distribute and possess with intent to distribute a controlled substance, to wit, one kilogram and more of a mixture and substance containing a detectable amount of heroin, in violation of Title 21, United States Code, Sections 812, 841(a)(1), and 841(b)(1)(A).

Overt Acts

3. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about August 19, 2008, FRANKLYN ANGEL ESTRELLA, the defendant, drove in a car from Bronx, New York, to a garage in Newark, New Jersey.

b. On or about August 19, 2008, SAUL CARILLO, the defendant, met with others in a garage in Newark, New Jersey, for the purpose of distributing heroin.

c. On or about August 19, 2008, SAUL ANTONIO PAEZ, a/k/a "Tony," the defendant, met with others in a garage in Newark, New Jersey, for the purpose of distributing heroin.

d. On or about August 19, 2008, CARLOS ALBERTO ESTRADA-MORALES, the defendant, met with others in a garage in Newark, New Jersey, for the purpose of distributing heroin.

e. On or about August 19, 2008, SONNY PEQUERO, a/k/a "Ramon Antonio Perez-Rodriguez," the defendant, drove in a

car from Bronx, New York, to a garage in Newark, New Jersey.

f. On or about August 19, 2008, EDDISON GLOSS, the defendant, met with others in a garage in Newark, New Jersey, for the purpose of distributing heroin.

g. On or about August 19, 2008, JAIME DUARTE-MARTINEZ, the defendant, met with others in a garage in Newark, New Jersey, for the purpose of distributing heroin.

(Title 21, United States Code, Section 846.)

FORFEITURE ALLEGATIONS

4. As a result of committing the controlled substance offense alleged in Count One of this Indictment, FRANKLYN ANGEL ESTRELLA, SAUL CARILLO, SAUL ANTONIO PAEZ, a/k/a "Tony," CARLOS ALBERTO ESTRADA-MORALES, SONNY PEQUERO, a/k/a "Ramon Antonio Perez-Rodriguez," EDDISON GLOSS, and JAIME DUARTE-MARTINEZ, the defendants, shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any and all property constituting or derived from any proceeds the defendant obtained directly or indirectly as a result of the narcotics violation and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the narcotics violation alleged in Count One of the Indictment.


5. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 21, United States Code,
Sections 841(a)(1), 846, and 853.)


FOREPERSON


MICHAEL J. GARCIA
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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SOUTHERN DISTRICT OF NEW YORK

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Defendants.

INDICTMENT

08 Cr.

(Title 21, United States Code,
Section 846.)


MICHAEL J. GARCIA
United States Attorney.


A TRUE BILL

Foreperson.
